

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

BENZOR SHEM VIDAL,

Plaintiff,

v.

ADVANCED CARE STAFFING, LLC,

Defendant.

Civ Action No. 22-cv-5335 (NRM)(MMH)

**DECLARATION OF HUGH BARAN IN SUPPORT OF PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION**

I, Hugh Baran, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am an attorney at Kakalec Law PLLC, which, together with Towards Justice and Nichols Kaster, PLLP, represents Plaintiff Benzor Shem Vidal in this action. I am an attorney in good standing admitted to practice before this Court.

2. I have been one of the lawyers primarily responsible for the prosecution of Plaintiff's claims in this case.

3. I make the statements in this Declaration based on my personal knowledge, and would so testify if called as a witness at trial.

Exhibits

4. Attached hereto as Exhibit 26 is a true and correct copy of the Supplemental Declaration of Benzor Shem Vidal.

5. Attached hereto as Exhibit 27 is a true and correct copy of a letter from Jeffrey S. Rogoff, Regional Solicitor, United States Department of Labor.

Dated: Brooklyn, New York
February 15, 2023

/s/ Hugh Baran
Hugh Baran (he/him)
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